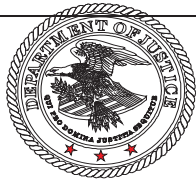


**MEMO ENDORSED**



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 12/27/2017

*86 Chambers Street, 3rd floor  
New York, New York 10007*

December 22, 2017

The January 5, 2018 Initial Pretrial Conference is adjourned to January 26, 2018 at 10:00 a.m., Courtroom 443, Thurgood Marshall U.S. Courthouse. The deadline to submit a joint letter and proposed Case Management Plan is adjourned to January 18, 2018.

**SO ORDERED.**

**BY ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

Re: *Bonner v. Department of Defense et al.*,  
No. 17 Civ. 9378 (VEC)

12/27/2017

Dear Judge Caproni:

**HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE**

We write respectfully on behalf of defendants the Department of Defense (“DOD”), the Central Intelligence Agency (“CIA”), and the Federal Bureau of Investigation (“FBI”) in the above-referenced action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), to request that the Court adjourn the initial pretrial conference presently scheduled for January 5, 2018, and the corresponding December 28, 2017 deadline to submit a pre-conference letter, for approximately two weeks. This is the first request for an adjournment of the initial pretrial conference. Plaintiff consents to this request.

In his FOIA request, plaintiff seeks certain records from the defendant agencies concerning the capture, detention, and interrogation of Zayn al-Abidin Muhammad Husayn, more commonly known as Abu Zubaydah, who is being detained at the U.S. Naval Station Guantanamo Bay. Defendants respectfully request an adjournment of the initial pretrial conference because the complaint was not served on the U.S. Attorney’s Office until December 11, 2017. Since that time, the undersigned attorneys have identified the appropriate contacts at the defendant agencies and gathered preliminary information concerning the status of the agencies’ respective searches for responsive records. However, additional time is needed to gather further information and develop a proposed schedule for future proceedings in this case, particularly given that many of the requested documents may be classified in whole or in part. In addition, the pre-conference letter is presently due December 28, 2017, and the undersigned attorneys will be out of the office during all or part of that week because of the Christmas holiday.

The parties have conferred and are available for a rescheduled conference on January 19 and 26, 2018, if those dates are convenient to the Court.



We thank the Court for its consideration of this request.

Respectfully submitted,

JOON H. KIM  
Acting United State Attorney for  
Southern District of New York

By: /s/ Sarah S. Normand  
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